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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GLANDER INTERNATIONAL BUNKERING
INC.,

Plaintiff,

v.

M/V DVINA GULF, IMO No. 9336464, her
engines, freights, apparel, appurtenances, tackle,
etc., *in rem*,

Defendant.

IN ADMIRALTY

NO. 2:19-cv-05206

MOTION FOR SUMMARY JUDGMENT

TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE, that Plaintiff Glander International Bunkering Inc. (hereinafter "Plaintiff"), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. Rule 56 and Local Rule 56.1., moves this Court, before the Honorable Esther Salas of the United States District Court for the District of New Jersey, for an Order granting summary judgment as a matter of law in favor of Plaintiff as to all claims contained in Plaintiff's Verified Complaint. Plaintiff will rely, in support of the motion, on the accompanying Memorandum of Law, Rule 56.1 Statement of Undisputed Material Facts, the Declaration of attorney Briton P. Sparkman with attached Exhibits A-F, and the pleadings and papers already on file in this action.

Dated: February 5, 2021
Oyster Bay, New York

Respectfully submitted,

CHALOS & CO, P.C.

By: /s/ Melissa Patzelt-Russo
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*Attorneys for Plaintiff
Glander International
Bunkering Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February 2021, a true and correct copy of Plaintiff's
Notice of Motion was served on all counsel of record:

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*Attorneys for Viterlef
Management Co. Inc. as
Owner and Claimant to the
in rem defendant vessel
M/V DVINA GULF*

/s/ Melissa Patzelt-Russo
Melissa Patzelt-Russo, Esq.